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Before the
FEDERAL COMMUNICATIONS COMMISSION FCC MAIL ROOM
Washington, DC. 20554

In the Matter of)
)
Amendment of Part 95 of the Commission's) WT Docket 95-102
Rules to Establish a very short distance) RM-8499
two-way voice radio service)

**A Petition
for an
Extension of Time
to file
Reply Comments
in a
Notice of Proposed Rulemaking**

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Submitted by

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Dated: October 5, 1995

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EXECUTIVE SUMMARY

The members of Suburban REACT 3410 request that the Commission extend the filing deadline for Reply Comments in WT Docket No. 95-102 no less than ninety (90) days.

DISCUSSION

Background of Suburban REACT 3410

Suburban REACT 3410 and its members have a history of over 15 years of use of the General Mobile Radio Service (GMRS) in the enhancement of public safety and providing volunteer community service at the local level. Its members operate a GMRS radio system that includes mobile relay "repeaters", mobile and portable equipment. Its total capital investment in radio equipment, excluding installation and maintenance costs, exceeds \$25,000. This investment includes ownership of multiple repeaters to provide redundancy so as to assure continuous and seamless operation in our community service activities.

Its members operate a local community watch program, REACT 3410 Patrol, that operates under the training of and in cooperation with the Police Department of the City of Philadelphia. Members invested over 2000 hours of patrol time, and over 5000 miles drive, in calendar year 1994 alone.

Suburban REACT 3410 maintains no paid staff. Its operations are managed and performed solely through the work of committed volunteers who hold individual desires to serve their communities.

Finally, Suburban REACT 3410 is a non-profit, membership association organized under the laws of the Commonwealth of Pennsylvania and a chartered member Team of REACT International, Inc. As such, the team is a non-profit, charitable organization under Section 501(c)(3) of the Revenue Code.

Based on the above, Suburban REACT is a small entity that is potentially subject to (a) *major impact(s)* from the outcome of WT Docket 95-102. We have interests, both organization and financial, in this proceeding.

Basis for this Petition

Being a small organization, with limited resources available to serve the public, the team is unable to retain the services of legal counsel to represent its interests in this matter. Thus, the team must rely on the personal time and resources of its individual members to advance its interests.

Suburban REACT 3410 and its members have a long history of involvement with matters before the Commission. Most recently, the team filed extensive Reply Comments in RM-8499. It is the desire of the team to continue this history and to file Reply Comments in 95-102 based on a thorough review, analysis and *open team discussion of* the Comments in this matter. This review, analysis and discussion will require additional time beyond that allowed in the original Notice.

CONCLUSION

Based on the above discussion, it is obvious that Suburban REACT, and its individual members, have an interest in WT Docket No. 95-102. Being an organization that the Notice of Proposed Rule Making seeks to benefit, with extensive operational

experience both in the GMRS and in serving the public using two-way radio, Suburban REACT is uniquely qualified to provide insight on the Comments filed with the Commission on this matter.

However, being an all volunteer organization, with no paid staff and lacking the resources to retain paid, legal counsel to represent its interests before the Commission, the team must depend on the donation of time and resources by its membership. This being the case, the 14 day Reply Comment period is insufficient to allow a full analysis, open and frank discussion by the membership, and filing of Reply Comments.

Therefore, the members of Suburban REACT 3410, by action at its October 3, 1995 General Membership Meeting, respectfully request that the Commission extend the filing deadline for Reply Comments in WT Docket No. 95-102 a period no less than ninety (90) days. The Commission's grant of this petition would extend the deadline for filing of reply comments until January 22, 1996.

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